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July 20, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Thursday, July 19, 2012, John Nakahata and Kasey Chow, on behalf of Linkup Telecom, Inc. ("Linkup Telecom"), as well as Robert Williams, President of Linkup Telecom, spoke with Kimberly Scardino, Divya Shenoy, Alexander Minard, and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed Linkup Telecom's Compliance Plan as originally filed on April 6, 2012.

John Nakahata gave a brief introduction and overview of the Company. Robert Williams elaborated on the Company, its current operations, its financial and technical capability to provide Lifeline service, its proposed Lifeline plans, its marketing strategy, and its proposed enrollment events and procedures.

We discussed Linkup Telecom's event marketing strategy and enrollment process. We also discussed Linkup Telecom's commitment to abide by the FCC's recertification requirements. Finally, Linkup Telecom agreed to file a revised Compliance Plan with all suggested changes and additions.

Attached is a copy of the presentation deck and Welcome Letter that were provided at the meeting yesterday; the sample certification form and sample marketing materials provided at the meeting were filed as Exhibit A and Exhibit B, respectively, of the Company's Compliance Plan.

Ms. Marlene H. Dortch

July 20, 2012

Page 2

Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey C. Chow

Associate to Lance J.M. Steinhart

Attorney for Linkup Telecom, Inc.

Attachments

cc: Robert Williams
John Nakahata
Kimberly Scardino
Divya Shenoy
Alexander Minard
Jonathan Lechter

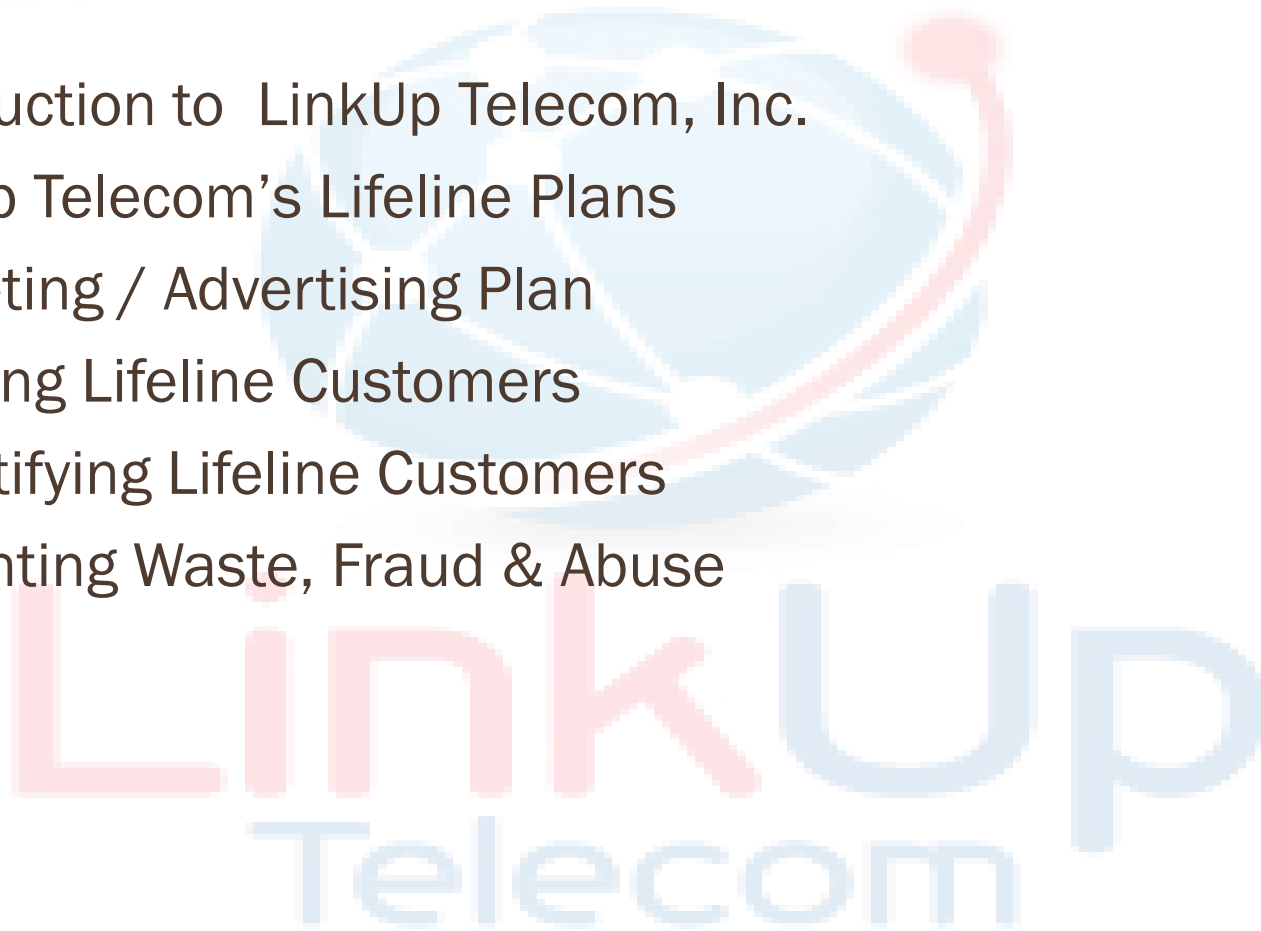


LinkUp Telecom, Inc.

FCC MEETING: JULY 19, 2012

AGENDA

- ❑ Introduction to LinkUp Telecom, Inc.
- ❑ LinkUp Telecom's Lifeline Plans
- ❑ Marketing / Advertising Plan
- ❑ Enrolling Lifeline Customers
- ❑ Recertifying Lifeline Customers
- ❑ Preventing Waste, Fraud & Abuse
- ❑ Q & A



LINKUP TELECOM, INC.

- ❑ LinkUp Telecom is a Florida corporation and provides Lifeline services (wireless and landline) for over 3 years supporting the following states:
 - North Carolina, Maryland, and West Virginia
 - ❖ Wireless customers: ~22,000
 - ❖ Landline customers: ~200

- ❑ Vision Statement:
 - To be an innovative provider of quality products and services to low income households via government sponsored programs.

- ❑ Mission Statement:
 - To provide excellent customer service, pertinent products and services, and efficient operations.

LINKUP TELECOM, INC.

- ❑ In compliance with newly amended section 54.202, LinkUp Telecom certifies:
 - It will comply with the service requirements applicable to the support that it receives;
 - It has the ability to remain functional in emergency situations;
 - It will satisfy applicable consumer protection and service quality standards; and
 - It is financially and technically capable of providing the Lifeline service.

LINKUP TELECOM LIFELINE PLANS

- ❑ LinkUp Telecom proposes a choice between two (2) Lifeline plans:
 - 100 Monthly Minutes
 - 250 Monthly Minutes

- ❑ All plans include:
 - Free handset
 - Free calls to Customer Service
 - Free calls to 911 Emergency Services
 - Free Voicemail, Caller ID, and Call Waiting
 - Free Domestic Long Distance

LINKUP TELECOM LIFELINE PLANS

Detailed Plan Breakdown

100 MINUTES

- FREE
- 100 anytime minutes
- Minutes rollover
- 3 texts = 1 minute

250 MINUTES

- FREE
- 250 anytime minutes
- Minutes do not rollover
- No Text messaging

Additional airtime available for purchase at retail locations or by contacting customer service

LINKUP TELECOM LIFELINE PLANS

❑ Public Safety and 911 / E911 Access:

- LinkUp Telecom will ensure that all handsets used in connection with its Lifeline service are E911-compliant.
- LinkUp Telecom will provide its Lifeline customers with access to 911 and E911 services:
 - through its underlying carrier, Sprint
 - at the time of Lifeline service initiation
 - regardless of activation status and minute availability

LINKUP TELECOM MARKETING / ADVERTISING PLAN

- ❑ All materials will comply with disclosure requirements:
 - Disclose company name under which it does business;
 - Explain in clear, easily understood language the following:
 - Only eligible consumer may enroll in the program;
 - What documentation is necessary for enrollment;
 - The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - Lifeline is a government benefit program; and
 - Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

LINKUP TELECOM MARKETING / ADVERTISING PLAN (CONT)

□ LinkUp Telecom intends to market its Lifeline service via:

- Our promotional campaign will consist of several media channels focused on delivering a high quality message to our target audience. These various channels will include:
 - *Local newspaper advertising via ad and brochure insert*
 - ❖ This advertising will consist of running a ¼ page ad bi-weekly for 2 months in local newspapers. We will also include a self-addressed, postage paid brochure to be completed by our customer base
 - *Local radio advertising*
 - ❖ Our local radio advertising will appear on a variety of radio stations that cater to specific segments of our demographic. We will run 90, 30 second commercials per month for six months.
 - *Local cable TV*
 - ❖ Our cable TV campaign will consist of 40, 30 second commercials aired on various networks for a six month period.
 - *Social Media - Facebook and Twitter*
 - ❖ LinkUp Telecom will continually update our Facebook and Twitter pages providing our customers with up-to-date information on our local distribution locations and “Did you know” facts about ways to improve the use of their cellular devices and other information pertinent to the target audience.

LINKUP TELECOM MARKETING / ADVERTISING PLAN (CONT)

- *Social Events*
 - ❖ LinkUp Telecom will partner with various social groups and agencies that support our demographic through sponsored events such as health screenings, back-to-school programs, and feed-the-needy programs.
- *Mobile van advertising and direct distribution*
 - ❖ LinkUp Telecom will promote our products/services with local distribution via mobile van advertising and distribution at designated locations.
- *Direct mail*
 - ❖ LinkUp Telecom will provide direct mail campaigns to a targeted group of individuals that meet certain criteria based on purchased third-party lists. This will include a self-addressed, postage paid, brochure that can be completed and mailed to our business office.
- *Store front location*
 - ❖ LinkUp Telecom will establish a “brick and mortar” location in one or more of the primary cities we have targeted for our distribution. These storefronts will be located in areas near our target audience for easy access to our products and also as an option to get assistance, when necessary.
- *Billboards*
 - ❖ LinkUp Telecom will purchase ad space with local billboard owners in various strategic locations throughout our targeted cities. These billboard ads will vary from highway locations to neighborhood areas.
- *Public Relations*
 - ❖ Press releases will be issued to the local paper describing our program and its’ many benefits to the community and will also include video testimonials and footage of our events. On certain occasions LinkUp Telecom will sponsor various contests with our customers to promote our brand and encourage continued use of our services.

ENROLLING LIFELINE CUSTOMERS

□ Eligibility Confirmation:

1. Confirm prospect's identity (see government issued picture ID)
2. Confirm program or income eligibility (check database, where available, or see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement

ENROLLING LIFELINE CUSTOMERS

❑ End-User Education and Disclosures:

- Lifeline is a federal non-transferable benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government

ENROLLING LIFELINE CUSTOMERS

- End User Attestations:
 - See Certification Form



LL Form MD

LinkUp
Telecom

RECERTIFYING LIFELINE CUSTOMERS

□ Annual Recertification Compliance:

- LinkUp Telecom commits to re-certify the eligibility of all Lifeline customers as of June 1, 2012 by December 31, 2012 and report the results to USAC.
- After 2012, LinkUp Telecom will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
- All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
- In addition, LinkUp Telecom will continue to follow any state-specific requirements.

PREVENTING WASTE, FRAUD & ABUSE

- LinkUp Telecom utilizes a diligent Enrollment Process
- LinkUp Telecom utilizes CGM's validation process to prevent the following:
 - ❖ Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month
 - ❖ Inactive lines receiving subsidy
- LinkUp Telecom will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- LinkUp Telecom has a 60-day non-usage policy
- LinkUp Telecom emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures

PREVENTING WASTE, FRAUD & ABUSE (CONT)

□ Additional Measures to prevent waste, fraud & abuse:

- Duplicates Database
 - ❖ CGM, LLC
 - ❖ TSB
 - ❖ National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
 - ❖ *if LinkUp Telecom draws \$5 million+ on an annual basis

LinkUp
Telecom

QUESTIONS..





18W140 Butterfield Rd. Suite 1500
Oakbrook Terrace IL 60181.
Customer Service: 855-574-2037
Fax: (888) 894-7830
www.mylinkuptelecom.com

Lifeline
Government Supported Cellular Services

Welcome to LinkUp Telecom

Before You Get Started...

Upon receiving your phone, you must activate it by placing and completing a phone call to Customer Service at 855-574-2037.

What must I do to keep my phone?

After 1 year of service you must re-certify your eligibility by responding to LinkUp Telecom's attempts to contact you. Failure to use your phone for a 60 day period may result in disconnection of your service. You must call Customer Service at 855-574-2037 from your LinkUp Telecom phone once each month to avoid disconnection of your service.

Check My Minutes • Dial 611

To see how many minutes you have left – you must call this number from your cell phone, or by calling Customer Service 1-855-574-2037. Calls made from your LinkUp Telecom phone to customer service **will not** deplete from your available minutes.

How many minutes do I get?

Your phone comes pre-loaded with minutes. Every month on the same day, you will receive new minutes. Loading date is the same as activation date.

- 1. Lifeline Plan 1:** 250 Minutes. Under Lifeline Plan 1, eligible customers enjoy 250 anytime minutes. These minutes do not rollover and text messaging is not included.
- 2. Lifeline Plan 2:** 100 Minutes. Under Lifeline Plan 2, eligible customers enjoy 100 anytime minutes that rollover for ninety (90) days. Text messaging is at the rate of one-third of one minute (3 texts = 1 minute).

How do I add minutes to my phone?

You can add minutes by calling:

Customer Service 855-574-2037

Direct Pay:

\$5.00 - 60 min. / \$10.00 - 180 min. / \$20.00 - 400 min.
\$30.00 - 600 min. / \$50.00 - 1000 min.

What if I move?

If you move, please contact LinkUp Telecom at 855-574-2037 with your new address.

Long Distance?

The minutes and airtime credits provided on your LinkUp Telecom phone are nationwide minutes, allowing you to make calls anywhere in the US without incurring any long distance charges. You will only be charged normal airtime for all long distance calls.

411 and Information?

Dialing 411 for directory assistance from your LinkUp Telecom

phone will result in a charge of \$1.25 deducted from your pool of available airtime. To avoid charges, we recommend you utilize a free directory assistance service such as 1-800-FREE-411.

Toll Free Calls?

Calls made to toll free numbers (800, 888, 877, etc.) incur no additional charge but do utilize your available airtime.

Important Information?

ALL CALLS PLACED TO 911 EMERGENCY RESPONSE ARE FREE. Subscribers cannot place calls to 500, 700, 900 or 976 numbers, or place operator-assisted calls such as third party-billed and collect calls. Subscribers cannot place calls to local or long distance numbers identified as party line. Subscribers will be billed regular airtime for toll free numbers such as 800, 877 and 888.

Does my phone have text messaging?

Under Lifeline Plan 1: No text messages are included.

Under Lifeline Plan 2: You can send and receive text messages with your LinkUp Telecom wireless phone. Each message (in or out) will use one-third of one minute (3 texts = 1 minute)

Can I send/receive pictures or get on the internet?

Although you may have a phone with a camera, you can take pictures but you can NOT send or receive pictures or access the internet unless you connect your phone to a PC.

How do I access my voicemail messages?

To access voicemail dial your cellular phone number from your cellular phone. Follow the voice prompts to set up your greeting and password. Please be aware that calls to voicemail use minutes just like calls.

Where can I call?

You can only place calls within the continental U.S. Toll Free calls (800, 877, 866) still use your minutes. 911 calls are always available and free even if you are out of minutes.

What if I lose my Phone?

If your phone is lost, stolen, or becomes inoperable, please contact LinkUp Telecom at 855-574-2037 for a replacement handset. Replacement handsets are \$25.00 prepaid.

REFERRAL PROGRAM

YOU GET **100** FREE BONUS MINUTES

For each person you refer to LinkUp Telecom